

Before the  
Federal Communications Commission  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Application by New York Telephone )  
Company (d/b/a Bell Atlantic – New )  
York), Bell Atlantic Communications, )  
Inc., NYNEX Long Distance Company, )  
and Bell Atlantic Global Networks, Inc., )  
for Authorization to Provide In-Region, )  
InterLATA Services in New York )

CC Docket No. 99-295

Comments of

Keep America Connected  
American Council on Education  
Child Health Foundation  
Harlem Consumer Education Council  
Hispanic Federation  
Hispanic Heritage Leadership Conference  
National Association of Commissions for Women  
National Association of Development Organizations  
National Association of Hispanic Publications  
National Conference on Puerto Rican Women, Inc.  
National Hispanic Council on the Aging  
National Latina Institute for Reproductive Health  
National Puerto Rican Coalition  
National Urban League  
Puerto Rico Federal Affairs Administration  
Telecommunications Advocacy Group  
The National Trust for the Development of African American Men  
United Homeowners Association  
United States Hispanic Chamber of Commerce

October 19, 1999

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## **Table of Contents**

<b>Section</b>	<b>Page</b>
I. Statement of Interests	4
II. Benefits of Increased Competition	10
III. Consumers Demand Real Choices	11
IV. Best Practices	11
V. Conclusion	12

The undersigned organizations welcome the opportunity to submit comments in support of New York Telephone Company (d/b/a Bell Atlantic – New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc. (hereinafter referred to as Bell Atlantic) filing requesting FCC authorization to provide in-region, interLATA services in New York. The commenters represent a broad range of interests and organizations. We believe that Bell Atlantic's entry into the long distance market in the state of New York will open the marketplace to true local, long distance and data services competition benefiting consumers and businesses alike.

The vision of the Telecommunications Act of 1996 was to promote choice and competition in the telecommunications industry. Bell Atlantic's entry into the long distance market will be another positive step in that direction. The Commission's approval of this application will do more than allow Bell Atlantic to provide long distance services in New York. Across-the-board competition will result from Bell Atlantic's entry into the long distance marketplace. Increased competition will not only benefit consumers but also will provide for new business opportunities, particularly for minority businesses, to supply services and products to the telecommunications companies offering services in New York. Other competitors will accelerate their efforts to compete in the local market, as well to meet the challenges presented by a new major competitor for telecommunications services.

We call upon the Commission to quickly approve Bell Atlantic's 271 application. Consumers deserve and demand the simplicity of choice, variety of services at affordable

prices, and the commitment to serve the residential customer that Bell Atlantic has made as part of its 271 application.

#### **I. Statement of Interests**

**Keep America Connected (KAC)** is an organization comprised of groups whose demonstrated goals involve promoting a variety of telecommunications issues. The primary goal of KAC is that regardless of income, race, disability, age, ethnicity or geographical location, affordable access to the use of the modern telecommunications infrastructure and services should be available. This goal is best achieved through the rapid development of a fully competitive marketplace that ensures that consumers across the nation will have access to more services at lower prices.

**American Council on Education (ACE)** is a nonprofit association comprised of 1,850 colleges, universities and other educational associations. ACE supports efforts to enhance telecommunications services or offerings available to its members.

**Child Health Foundation** was established in 1985 as a non-profit, public charity to prevent and treat life-threatening communicable diseases of infants and children in the United States and abroad. Their mission is "to save the greatest number of children's lives at the lowest possible cost." We accomplish this through our unique network of health professionals and organizations committed to improving health policies and practices. We operate as an independent agent of change, seeking and promoting more effective, easily delivered and less-expensive methods to prevent illness and death of children. We focus on prevention and treatment of dehydration from diarrheal diseases, which debilitate and kill millions of infants and children worldwide every year.

**Harlem Consumer Education Council, Inc.**, is a consumer advocacy, consumer education and training organization based in New York City, New York. The organization is involved in telecommunications issues, particularly as they affect low income and minority consumers. Among its activities is sponsorship of "Harlem Consumer Awareness Day," a joint conference with state and federal agencies.

**Hispanic Federation (HF)** is a membership organization of Latino health and human service agencies serving Hispanics in New York, New Jersey and Connecticut. HF's mission is to build and strengthen community-based organizations which provide Latinos with a host of services, including immigration services, health care, economic development, job training, AIDS prevention, youth services, leadership development, and housing.

**Hispanic Heritage Leadership Conference** was founded in 1995. It was designed to bring together political and business leaders in an educational forum to discuss issues important to the Hispanic Community. The Hispanic Heritage Leadership Conference has also created a breakfast series held at the Capitol Hill Club - where Congressmen, Senators, and other influential government & corporate entities can have direct access to, and address, the Hispanic Leadership on a wide variety of issues.

**National Association of Commissions for Women (NACW)** represents local commissions established to promote the interests of women in cultural, social, and economic fields. NACW supports policies and programs that empower women to make informed choices about all aspects of their lives. NACW has been active in the debate on telecommunications reform, supporting legislative and regulatory initiatives to encourage

competition, thereby creating new options and services for women as consumers and in their businesses.

**National Association of Development Organizations (NADO)** is a public interest group founded in 1967 to promote community and economic development in America's small metropolitan and rural areas. NADO is a leading advocate for a regional approach to community and economic development, including the deployment of telecommunications services to rural and small urban areas. The association's primary goal is to assure all rural citizens have employment opportunities, public services, and a quality of life comparable to other Americans. NADO's members are regional development organizations whose staff provides professional assistance to local governments, businesses, and nonprofit organizations. Regional development organizations help identify local needs and priorities, and are catalysts for strategic planning in rural communities. The functions of regional development organizations vary depending on the needs of local citizens and may include: small business financing, infrastructure and housing development, job training, environmental protection, and services for the poor and seniors. Each region is governed by a policy board of elected officials, business leaders, and citizen representatives.

**National Association of Hispanic Publications (NAHP)** has a membership of 120 publications from throughout the United States, with a circulation of 7.5 million. NAHP promotes Hispanic print, provides technical assistance and information to its members, and addresses issues of interest and concern to its members' readership. NAHP has carried out many programs and events designed to promote business opportunities for its members. NAHP coordinates national public information campaigns

through its member publications and continues to support Hispanic journalism students through scholarships.

**National Conference of Puerto Rican Women (NACPRW)** is a women's organization with local chapters throughout the United States primarily engaged in education advocacy for Latino youth & parents, youth leadership development, college-bound science and technology scholarship program, small business issues, women's health issues, and other civil and socio-economic issues of concern to women in general, and Latino women in particular.

**National Hispanic Council on Aging** is a membership organization that promotes the well being of Hispanic elderly. Members represent fields of administration, planning, direct services, research and education.

**National Latina Institute for Reproductive Health (NLIRH)** deals specifically with women's health issues, Latina women in particular. The mission of the NLIRH is to enhance the quality of life of Latina women nationwide, especially reproductive health, through advocacy, networking, public policy, and education and technology programs.

**National Puerto Rican Coalition (NPRC)** represents the interests of 7 million Puerto Rican United States citizens through a network of over 1,000 community-based organizations and leaders. NPRC's mission is to systematically strengthen and enhance the social, political, and economic well-being of Puerto Ricans throughout the United States and in Puerto Rico with a special focus on the most vulnerable. To accomplish this mission, NPRC has identified strategic goals that support the organization's efforts to further the empowerment of the Puerto Rican community at the public and private sectors level, and enhance the image of the Puerto Rican community.

**National Urban League, Inc.** is the premier social service and civil rights organization in America. The League is a nonprofit, community-based organization headquartered in New York City, with 114 affiliates in 34 states and the District of Columbia, including many in the Bell Atlantic region. The mission of the League is to assist African Americans in the achievement of social and economic equality.

**Puerto Rico Federal Affairs Administration** represents the Governor of Puerto Rico's office in Washington, D.C. It tracks legislation, issues position papers, provides comments regarding policy matters affecting Puerto Rico, and follows economic and technology development issues including consumer issues affecting the people of Puerto Rico, among others.

**Telecommunications Advocacy Group** was established by the Libraries of the Future to address issues in the telecommunications arena. The Libraries of the Future has developed a nationwide campaign to raise public awareness regarding our right to communications and information. Educators, social activists, government officials, small business owners, artists, students, immigrants, and librarians need the information and tools to fight for telecommunications policies that serve the public interest. The LFF Telecommunications Advocacy Project (LFF/TAP) has four major goals: (1) promote public awareness of pending telecommunications legislation and its implications for public access and learning; (2) build the skills of public access advocates in analyzing and influencing legislation; (3) stimulate cross-sector participation in specific legislative actions; (4) promote development of a common agenda for democratic communications policies involving multiple sectors.



**The National Trust for the Development of African American Men** is a national, nonprofit organization based in the Washington, D.C. area that addresses the development, needs and challenges of African-Americans, especially males, in the areas of health, leadership, training, economic development, education, and crime prevention from an African American view of the world. The Trust operates programs throughout the Bell Atlantic region with a particular emphasis on technology training and making computers and on-line services accessible in low income and underserved communities.

**United Homeowners Association (UHA)** is a national, nonprofit, membership based organization that represents the interests of homeowners in Washington, D.C. UHA has an active communications advocacy program on behalf of its members. UHA has promoted the interests of homeowners in telecommunications to Congress, before the FCC and in the courts.

**United States Hispanic Chamber of Commerce (USHCC)** mission is to strength Hispanic business associations at the local, state, and national level. Implementing national programs that assist the economic development of Hispanic firms. Increasing business relationships and partnership between the corporate sector and Hispanic-owned businesses. Celebrating Hispanic Business achievements at the USHCC's Annual National Convention, as well as at Legislative and International events. Promoting international trade between Hispanic businesses in the United States and Latin America. Monitoring legislation, policies and programs that affect the Hispanic business community. Providing technical assistance to Hispanic business associations and entrepreneurs.

## **II. Benefits of Increased Competition**

Competition for local telephone service in the New York telecommunications marketplace is expanding. Long distance carriers, CLECs and high-speed Internet services providers are offering all forms of telecommunications services throughout the state. The local market is open in New York and Bell Atlantic has met one of the primary requisites for approval to provide long distance services under the 271-checklist process.

Consumers will greatly benefit from Bell Atlantic's entry into the New York market. The competitive pressures which will result from a new significant player in this ever-expanding market will drive all telecommunications companies to become more innovative in the services and products they offer. Competition lowers prices and with Bell Atlantic in the long distance market, services and products will be provided at affordable prices to all consumers.

Bell Atlantic has further committed to provide a full range of telecommunications services to the residential customers throughout the state. Urban, rural and minority residential customers, as well as small and large businesses, will benefit from the company's commitment to serve all regions of the state with a bundle of services. This commitment on behalf of Bell Atlantic will cause the other telecommunications companies to offer services and products to the residential customer. In anticipation of Bell Atlantic's entry into the long distance market, MCI/WorldCom and others are currently beginning to market local telephone services to residential customers. The dynamic forces of Bell Atlantic's entry into the long distance market will foster

competitive advantages, through more services and products at lower costs, for all consumers in New York.

### **III. Consumers Demand Real Choices**

The “big three” dominate the long distance marketplace in New York. These companies have focused their attention on offering services to large volume or business customers. Residential or small volume users have not received the benefits of competition in the current long distance market structure. We are particularly concerned that low volume residential customers are being left behind and are the hardest hit by the incumbents’ usage requirements and/or fixed fees.

Bell Atlantic has promised to remedy this inequity by providing real choice to consumers. Bell Atlantic has committed to provide a variety of easy to understand calling plans that will fit the needs of all of its customers, from the low volume residential user to the high volume business customer. Bell Atlantic will be able to offer a bundle of services (local, long distance and data services) to consumers at reasonable prices.

As the local telephone company in New York, Bell Atlantic has a long history of responding to the needs of its customers. This desire to serve will be carried over into its offering of long distance services. Consumers throughout New York will reap the rewards of increased competition and the menu of choices they will receive from Bell Atlantic’s entry into the long distance market.

### **IV. Best Practices**

The commenters urge Bell Atlantic to continue its commitments to consumer protection, universal design, and supplier diversity in its foray into the long distance market. The company’s commitment to combat slamming and cramming and to ensure

the rights of privacy must be made a core value of its long distance company. As competition for local, long distance and data services increase, consumers will need the protections offered against fraud that Bell Atlantic has demonstrated in its current operations.

We also look towards Bell Atlantic to continue its commitment to universal design and making products and services accessible to persons with disabilities. The company should also continue its commitment to use minority vendors to provide products and services. We seek to ensure that all consumers receive the benefits of the telecommunications revolution now taking place in this nation.

#### **IV. Conclusion**

We believe the benefits derived from Bell Atlantic's entry into the long distance market in New York will expand far beyond long distance services and will touch all levels of competition for telecommunications services. We urge the Commission's expeditious approval of Bell Atlantic's New York 271 application.

The Commission's approval of this application will facilitate local, long distance and data services competition in New York and begin to fulfill the goals of the Telecommunications Act of 1996. We look forward to the direct and accelerated competition that will result from Bell Atlantic's entry into the long distance market, the availability of easy to understand choices for telecommunications services at affordable prices, and the company's continued commitment to consumer protection, universal design, and supplier diversity.

The approval of Bell Atlantic's New York 271 application is in the public's interest and is supported by the undersigned organizations.

Respectfully submitted,



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